

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Lynnelle R. Marche aka Lynnelle Wakefield
Debtor(s)

vs.

Deutsche Bank National Trust Company as Trustee for
the SACO I Inc., Mortgage Pass-Through Certificates,
Series 1999-5

Respondent

CHAPTER 13

CASE NO. 18-17303 AMC

**AMENDED RESPONSE OF DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE
FOR THE SACO I INC., MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 1999-5 TO
DEBTOR'S OPPOSITION TO LENDER'S RESPONSE TO NOTICE OF FINAL CURE**

Respondent, Deutsche Bank National Trust Company as Trustee for the SACO I Inc., Mortgage Pass-Through Certificates, Series 1999-5, by and through its counsel, KML Law Group, P.C., hereby responds to the Debtor's Opposition to Response to Notice of Final Cure as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without information to admit or deny. Strict proof is demanded at time of trial.
5. Denied. Respondent is without information to admit or deny. Strict proof is demanded at time of trial.
6. Denied. Respondent is without information to admit or deny. Strict proof is demanded at time of trial.
7. Denied. Respondent is without information to admit or deny. Strict proof is demanded at time of trial.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Denied. The Response states that the loan is contractually due for June 1, 2016. Further clarification was then added that a signed loan modification was never received as Respondent did receive the original signatures for the 2021 loan modification. However, upon information and belief, it appears that the November 2021 modification was received. This is a federally-back mortgage, though, and HUD/FHA

required the underwriting to be updated, resulting in a lower principal balance, lower interest rate, and lower monthly payment. Therefore, the 2021 loan modification never went into effect. The updated terms were sent to Debtor in January 2022, and that modification is the one that was not executed.

15. Denied.

16. Denied. This is a conclusion of law to which no response is necessary.

17. Denied. This is a conclusion of law to which no response is necessary.

18. Denied. This is a conclusion of law to which no response is necessary.

WHEREFORE, Respondent respectfully requests that Debtor's opposition to Respondent's Notice of Final Cure be overruled.

/s/ Denise Carlon, Esquire
Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Attorney for Respondent

Date: October 7, 2022